

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

MICHAEL P. O'NEIL and NICOLA  
GRASSO

Plaintiffs,

v.

PETER F. NERONHA, in his Official  
Capacity as Attorney General of Rhode  
Island and COLONEL JAMES M. MANNI,  
in his Official Capacity as the  
Superintendent of the Rhode Island State  
Police

Defendants.

Civil Action No. 1:19-cv-00612-WES-PAS

**DECLARATION OF [REDACTED]**

**COMES NOW,** [REDACTED] President, and states as follows:

1. I am an adult male resident of the State of [REDACTED] and am competent to testify as to the matters set forth in this declaration.
2. I am the President/CEO of [REDACTED]  
[REDACTED]
3. As part of its business, [REDACTED] sells stun guns throughout the United States of America where it is legal to do so.
4. Upon review of the relevant sales data, [REDACTED] has sold 1,607,448 stun guns to civilians in the United States from 2008 until today.
5. I understand that this declaration will be provided under SEAL to the Court and will not be shared with other entities or individuals outside of this matter as the data included in this declaration constitutes confidential business information of [REDACTED]

**FURTHER, DECLARANT SAYETH NAUGHT.**

Exhibit "C"

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on Dec 8, 2020 in

[REDACTED]

[REDACTED]

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

MICHAEL P. O'NEIL and NICOLA )  
GRASSO )

Plaintiffs, )

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PETER F. NERONHA, in his Official )  
Capacity as Attorney General of Rhode )  
Island and COLONEL JAMES M. MANNI, )  
in his Official Capacity as the )  
Superintendent of the Rhode Island State )  
Police )

Defendants. )  
\_\_\_\_\_ )

Civil Action No. 1:19-cv-00612-WES-PAS

**DECLARATION OF [REDACTED]**

**COMES NOW,** [REDACTED] and states as follows:

1. I am an adult male resident of the State of [REDACTED] and am competent to testify as to the matters set forth in this declaration.

2. I am the President of [REDACTED]

3. As part of its business, [REDACTED] sells stun guns throughout the United States of America where it is legal to do so.

4. Upon review of the relevant sales data, [REDACTED] has sold over 2,000,000 stun guns to civilians in the United States since 2010

5. I understand that this declaration will be provided under SEAL to the Court and will not be shared with other entities or individuals outside of this matter as the data included in this declaration constitutes confidential business information of [REDACTED]

**FURTHER, DECLARANT SAYETH NAUGHT.**

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on Nov 27, 2020 in [REDACTED]

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

MICHAEL P. O'NEIL and NICOLA  
GRASSO

Plaintiffs,

v.

PETER F. NERONHA, in his Official  
Capacity as Attorney General of Rhode  
Island and COLONEL JAMES M. MANNI,  
in his Official Capacity as the  
Superintendent of the Rhode Island State  
Police

Defendants.

Civil Action No. 1:19-cv-00612-WES-PAS

**DECLARATION OF**

**COMES NOW,** and states as follows:

1. I am an adult male resident of the State of and am competent to testify as to the matters set forth in this declaration.

2. I am the Vice President located in  
The company's website can be found at

3. As part of its business, sells stun guns throughout the United States of America where it is legal to do so.

4. Upon review of the relevant sales data, I can quantify the number of stun guns sold to consumers in the United States during the years from 2010 until November 2020, and this table demonstrates how many stun guns the company has sold to consumers during that specific year:

YEAR	STUN GUNS SOLD
2020	149,404
2019	158,836

2018	157,967
2017	136,678
2016	112,939
2015	49,951
2014	40,746
2013	47,289
2012	40,416
2011	30,655
2010	14,643
TOTAL	939,524

None of these sales were made to law enforcement officials or law enforcement agencies.

5. From 2010 through today, the company has sold approximately 939,524 stun guns in the United States. This number does not take into consideration stun guns sold before 2010 as I was unable to verify the sales statistics for those years.

6. As such, it is likely that the company has sold more than 1,000,000 stun guns in the United States.

7. I understand that this declaration will be provided under SEAL to the Court and will not be shared with other entities or individuals outside of this matter as the data included in this declaration constitutes confidential business information of [REDACTED]

**FURTHER, DECLARANT SAYETH NAUGHT.**

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on November 30, 2020 in [REDACTED]

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

MICHAEL P. O'NEIL and NICOLA  
GRASSO

Plaintiffs,

v.

PETER F. NERONHA, in his Official  
Capacity as Attorney General of Rhode  
Island and COLONEL JAMES M. MANNI,  
in his Official Capacity as the  
Superintendent of the Rhode Island State  
Police

Defendants.

Civil Action No. 1:19-cv-00612-WES-PAS

**DECLARATION OF [REDACTED]**

**COMES NOW,** [REDACTED] and states as follows:

1. I am an adult male resident of the State of [REDACTED] and am competent to testify as to the matters set forth in this declaration.

2. I am the President of [REDACTED] located in [REDACTED]

3. As part of its business, [REDACTED] sells stun guns throughout the United States of America where it is legal to do so.

4. Upon review of the relevant sales data, [REDACTED] has sold more than 1.9 million stun guns to civilians in the United States since July 2010. These sales do not include Tasers and apply only to civilians for their usage.

5. I understand that this declaration will be provided under SEAL to the Court and will not be shared with other entities or individuals outside of this matter as the data included in this declaration constitutes confidential business information of [REDACTED]

**FURTHER, DECLARANT SAYETH NAUGHT.**

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on January, 12, 2021 in

